

Please vote "no" on Devers to Palo Verde 2 Transmission Project



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Southern California Edison Company

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From: Nancy LaPlaca [nancylaplaca@yahoo.com]

Sent: Monday, May 28, 2007 9:58 PM

To: Gleason-WebEmail; Mundell-Web; Hatch-WebEmail; Mayes-WebEmail; Pierce-Web

Cc: 'Nancy LaPlaca'

Subject: Please vote "no" on Devers to Palo Verde 2 Transmission Project

Arizona Corporation Commission

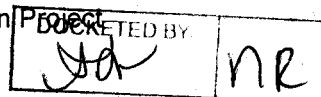
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AZ CORP COMMISSION
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Dear Chairman Mike Gleason, Commissioner Kris Mayes, Commissioner Bill Mundell, Commissioner Jeff Hatch-Miller and Commissioner Gary Pierce:

I am writing to ask that the Arizona Corporation Commission reject the Certificate of Environmental Compatibility for the Devers to Palo Verde 2 Transmission Line Project. It is not in the broader public interest. This proposed line will bring little, if any, benefits to Arizona rate payers and in fact is likely to result in increased rates for Arizonans, while at the time doing significant environmental harm. The proposed line is clearly incompatible with the KOFA National Wildlife Refuge as was determined by the Refuge manager, and would also negatively impact other sensitive public lands in our state.

This transmission line is contrary to the National Wildlife Refuge System mission and would hinder the efforts of the Refuge staff to meet the mandates of that mission. A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV line is incompatible with the mission of the Refuge.

The KOFA National Wildlife Refuge is one of only nine wildlife refuges in Arizona and the third largest wildlife refuge in the continental United States. This area is significant and critical to protection of wildlife and wildlife habitat including desert bighorn sheep and desert tortoises. The Refuge was established initially as the KOFA Game Range back in 1939 via an executive order. It was subsequently made a refuge in 1976 and in 1990, 516,200 acres of wilderness was designated within its boundaries under the Arizona Desert Wilderness Act. According to the U.S. Fish and Wildlife Service, this Refuge provides habitat for nearly 200 species of birds, 49 species of mammals, and 41 species of reptiles and amphibians.

The proposed route for DPV2 Line would cut through 23.8 miles of the KOFA National Wildlife Refuge and its important bighorn sheep habitat. Currently a Devers-Palo Verde 1 line exists, which this line would parallel. The first line was completed in 1982, and was a huge mistake. This proposal for a second line has been around for a while, but has been controversial since its inception, and would only compound previous errors.

The Arizona Power Plant and Line Siting Committee recommended approval of the Certificate of Environmental Compatibility for this transmission line on February 28, 2007. The Committee voted 8-3 to issue the Certificate of Environmental Compatibility to Southern California Edison. The Arizona Corporation Commission will make a final decision on this, however. The Arizona Corporation Commission can vote to confirm, deny or modify it and must "... balance, in the broad public interest, the need for an adequate, economical and reliable supply of electric power with the desire to minimize the effect thereof on the environment and ecology of this state. Through a separate process the US Fish and Wildlife Service had determined that the line is not compatible with the KOFA National Wildlife Refuge. Southern California Edison challenged that finding and the denial of the right-of-way permit and subsequently, the US Fish and Wildlife regional director overturned the decision of the refuge manager.

The Right-of-Way through KOFA is through prime desert bighorn sheep and desert tortoise habitat. The potential effects of another power line on bighorn sheep, especially on movement across the power line right-of-way and during the lambing period, are clearly contrary to the purposes for which the refuge was established. Considering that the population of sheep in the area is estimated to be down to 390 animals, a drop of approximately 230 animals from 2003

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and down from 812 animals in 2000, it is prudent to be cautious about introducing further disturbances.

In addition, potential impacts to reptiles, either attempting to cross roads or no longer able to cross the right-of-way because of its width, and migratory birds striking the power lines are also clearly contrary to the purposes of the refuge and its management mandates.

The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the Refuge. Visual impacts as well as recreational impacts on the KOFA National Wildlife Refuge would be significant and could not be mitigated. Adding additional industrial features to the landscape is a significant adverse visual change. The project would change the character of the KOFA and significantly diminish its recreational value as well.

The Final Environmental Impact Report/Environmental Impact Statement ("EIR/EIS") on this proposed project dictates clearly that the impact of the DPV2 transmission line on the Kofa will be irreparable and unmitigable. According to the EIR/EIS, the negative visual impacts in the Kofa National Wildlife Refuge would be significant and unmitigable (page ES-41).

The Power Plant and Line Siting Committee was charged with reviewing a number of factors including the total environment of the area, fish, wildlife and plant life and associated forms of life upon which they are dependent, existing scenic areas, and more, and it is to "give special consideration to the protection of areas unique because of biological wealth or because they are habitats for rare and endangered species." There is no doubt that the KOFA is unique and should be given special consideration.

The DVP2 is unnecessary for an adequate, economical and reliable supply of electric power for Arizona and would cause significant damage to our precious Arizona public lands. It is clear that the benefits of this project to Arizona and Arizona ratepayers are limited, at best, and that the environmental impacts are significant. Because of this, I strongly urge the Arizona Corporation Commission to reject the Certificate of Environmental Compatibility for the Devers to Palo Verde 2 Transmission Line.

Thank you for considering my comments.
Sincerely,
Lancy LaPlaca

Lancy LaPlaca

If you add up the energy required to extract and transport coal, plus heat conversion and transmission line loss, only 3% of the energy created by coal-fired power plants reaches an electrical outlet. -Amory Lovins, Scientific American, Sept. 2005.